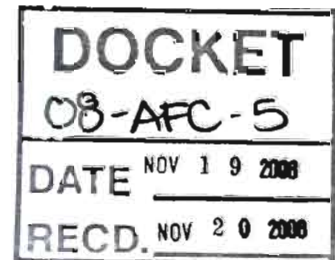


STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

Application for Certification for)
The Solar Two Power Project)
Stirling Energy Systems)
_____)

Docket No. 08-AFC-5



Applicant's Comments on Staff
Issues Identification Report
and Proposed Schedule

On November 17, 2008 the Assigned Committee issued an order requiring Staff to file its Issues Identification Report and suggested schedule on November 17, 2008. The Committee additionally allowed Applicant to respond to this Staff filing, but to file any response by November 20, 2008. Staff filed its Issue Identification Report on November 17 and Applicant hereby files its response.

Issues Identified by Staff. Staff/BLM have raised three potential issues in this proceeding: Cultural Resources, Land Use and Visual Resources. The Applicant agrees that these areas require a thorough analysis, but is convinced that both agencies, working with the applicant, will resolve any outstanding questions within the adopted schedule. The Applicant will work with CEC/BLM to assure that the agencies receive required information in a timely manner.

Schedule. Applicant agrees with the proposed schedule put forth by CEC/BLM, with the following caveats:


1. The applicant is waiting for the issuance of Staff/BLM first round of data requests in the areas of Air Quality and Cultural Resources. From the number of siting cases pending before the CEC, it is obvious that the CEC staff is under an extremely heavy workload and appears to be dealing with the challenge of insufficient resources. Since we expect that resolving issues and determining mitigation in the Cultural Resources area will likely be the "long-lead item" in our schedule, any assistance in giving the project a high priority, particularly in the area of Air Quality and Cultural Resources, would help the schedule. The Applicant is committed to respond to any data requests as quickly and thoroughly as it can.
2. The first workshop is scheduled for December 18, 2008. Applicant requests that data request workshops be noticed for both Sacramento and El Centro to make the most efficient use of CEC and BLM staff resources but also allow for appropriate involvement

of the public. For December 18, issues that could potentially be addressed in Sacramento include Land Use, Efficiency, Project Description, Socioeconomics, Soil and Water Resources, Traffic and Transportation and Waste Management. The data requests in these areas are relatively easy to satisfy and CEC Staff would be relieved of time lost to travel. The El Centro part of the workshop could deal with Biology and Cultural resources, allowing the full participation of BLM and the public without the burden of travel for representatives of BLM.

3. We note in Staff's scheduled schedule that approximately seven months are allocated between the release of the PSA/DEIS on March 5, 2009 and publication of the FSA/FEIS on October 1, 2009. The MOU between the CEC and BLM anticipates three to four months to accomplish the same events. We recognize that the three to four months identified in the MOU is insufficient given the 90 day review comment period required by the BLM and time needed by the agencies to respond to comments and prepare the final documents. We are hopeful, however, that the FSA/FDEIR can be prepared in less than four months after the close of the public comment period, particularly in light of the Governor's Executive Order S-14-08.

Respectfully submitted:

Dated: November 19, 2008


Allan J Thompson

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STATE OF CALIFORNIA
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Application for Certification for)
The SES Solar Two Project)
_____)

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PROOF OF SERVICE

I, Allan J. Thompson, declare that on November 19, 2008 I deposited a copy of the attached "Applicant's Comments on Staff Issues Identification Report and Proposed Schedule" in the United States mail at Orinda, California with first class postage thereon fully prepaid and addressed to the California Energy Commission, and a transmission via electronic mail, consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5 and 1210, of "Applicant's Comments on Staff Issues Identification Report and Proposed Schedule" and "Proof of Service" to all those identified on the Proof of Service list.

Proof of Service List

California Energy Commission
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November 19, 2008

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